### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

| ADAPTIX, INC.                   | §        |                                      |
|---------------------------------|----------|--------------------------------------|
|                                 | §        |                                      |
| <b>v.</b>                       | §        | CIVIL ACTION NO. 6:12-cv-22          |
|                                 | §        | (LEAD CASE)                          |
| ALCATEL-LUCENT USA INC., ET AL. | §        |                                      |
|                                 | <b>§</b> |                                      |
| ADAPTIX, INC.                   | §        |                                      |
|                                 | §        |                                      |
| <b>v.</b>                       | §        | CIVIL ACTION NO. 6:12-cv-369         |
|                                 | §        | (LEAD CASE)                          |
| ERICSSON INC., ET AL.           | §        | · ·                                  |
| *                               | §        |                                      |
| ADAPTIX, INC.                   | 8        |                                      |
| ADAF IIA, INC.                  | §        |                                      |
|                                 | §<br>e   | CIVIL ACTION NO. (.14 501            |
| <b>v.</b>                       | §        | <b>CIVIL ACTION NO. 6:14-cv-501,</b> |
|                                 | <b>§</b> | -502, -503                           |
| ERICSSON INC., ET AL.           | §        |                                      |
|                                 | §        |                                      |

# DEFENDANTS' NOTICE OF OBJECTIONS TO PLAINTIFF'S DESIGNATIONS FOR THE DEPOSITION OF HUI LIU

Defendants Alcatel-Lucent USA, Inc., AT&T Mobility LLC, Cellco Partnership d/b/a
Verizon Wireless, and Sprint Spectrum L.P. (collectively "Defendants") hereby provide
objections to Plaintiff's deposition designations as noted during the November 18, 2015 hearing
on the Defendants' Motion to Dismiss for Lack of Standing.

| Designations    | Objections |
|-----------------|------------|
| 147:6 – 147:25  |            |
| 148:2 – 148:24  | Leading    |
| 149:1 – 149:4   | Leading    |
| 149:6 – 149:9   | Leading    |
| 149:11 – 149:25 | Leading    |
| 150:1 – 150:23  | Leading    |

| Designations    | Objections                |
|-----------------|---------------------------|
| 150:25 – 152:7  | Leading                   |
| 152:10 – 152:18 | Leading                   |
| 152:20 – 152:25 | Leading                   |
| 153:1 – 154:13  | Leading                   |
| 154:15          | Leading                   |
| 154:17 – 154:22 | Leading                   |
| 154:24 – 155:22 | Leading; Legal Conclusion |
| 155:25 – 156:10 | Leading; Legal Conclusion |
| 156:12 – 156:13 | Leading; Legal Conclusion |
| 156:16 – 157:8  | Leading; Legal Conclusion |
| 157:11          | Leading; Legal Conclusion |
| 157:14 – 158:12 | Leading; Legal Conclusion |
| 158:15 – 159:3  | Leading; Legal Conclusion |
| 159:5 – 160:11  | Leading; Legal Conclusion |
| 160:14 – 162:20 | Leading                   |
| 162:22 – 163:15 | Leading                   |
| 163:18 – 164:2  | Leading                   |
| 164:4 – 165:10  | Leading                   |
| 165:12 – 168:20 | Leading                   |
| 168:22 – 169:17 | Leading                   |
| 169:19          | Leading                   |
| 169:21 – 169:24 | Leading                   |
| 170:1 – 170:24  | Leading                   |
| 171:1 – 171:2   | Leading                   |
| 171:4 – 171:6   | Leading                   |
| 171:8 – 172:19  | Leading; Legal Conclusion |
| 172:22 – 172:24 | Leading; Legal Conclusion |
| 173:1 – 173:11  | Leading; Legal Conclusion |
| 173:14 – 173:18 | Leading; Legal Conclusion |
| 173:20 – 174:11 | Leading; Legal Conclusion |
| 174:13 – 174:14 | Leading; Legal Conclusion |
| 174:16 – 174:17 | Leading; Legal Conclusion |
| 174:20 – 174:23 | Leading; Legal Conclusion |
| 174:25 – 175:2  | Leading; Legal Conclusion |
| 175:4 – 175:19  | Leading                   |
| 175:21 – 176:3  | Leading                   |
| 176:9 – 178:22  | Leading; Argumentative    |
| 178:25 – 179:3  | Leading                   |
| 179:5           | Leading                   |
| 179:7 – 181:4   | Leading                   |

| Designations    | Objections       |
|-----------------|------------------|
| 181:7 – 181:15  | Expert testimony |
| 181:17 – 181:20 | Leading          |
| 181:22 – 182:1  | Leading          |
| 182:4 – 182:5   | Leading          |
| 182:8 – 182:12  | Leading          |
| 182:14 – 184:3  |                  |
| 184:5 – 184:24  |                  |
| 185:1 – 187:1   | Leading          |
| 187:3 – 187:6   | Leading          |
| 187:9 – 189:10  | Leading          |
| 189:12 – 192:15 | Leading          |
| 219:7 – 219:8   | Leading          |
| 219:10 – 220:19 | Leading          |
| 220:21 – 220:25 | Leading          |
| 221:2 – 221:9   | Leading          |
| 221:12 – 221:18 | Leading          |
| 221:20 – 222:15 | Leading          |
| 222:17 – 222:20 | Leading          |
| 222:22 – 222:23 | Leading          |
| 222:25 – 223:4  | Leading          |
| 222:6 – 222:9   | Leading          |
| 223:11 – 223:14 |                  |

DATED: November 25, 2015

Respectfully submitted,

By: /s/ David A. Nelson

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**CERTIFICATE OF SERVICE** 

I hereby certify that counsel of record who are deemed to have consented to electronic

service are being served this 25th day of November, 2015, with a copy of this document, via

ECF notification.

/s/ Stephen A. Swedlow

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